



**Guidance
on Ancillary Services applications to
the Registrar of Companies**

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1. Introduction

This guidance provides an overview of the regulatory requirements for Ancillary Service Providers (ASPs) operating within the Astana International Financial Centre (AIFC). It outlines key obligations, compliance measures, and best practices to ensure adherence to the AIFC framework, enhancing operational efficiency and regulatory compliance.

This guidance is administered by the Registrar of Companies.

Please note that this Guidance is non-binding and should be read together with the relevant AIFC Acts. The Guidance should not be perceived as a substitute for legal advice. The Registrar of Companies strongly recommends seeking guidance from a legal consultant, preferably a firm, registered as an Ancillary Service Provider (ASP) within AIFC, to assist you in navigating the licensing process. For a complete list of ASP firms, please refer to the [AIFC Public Register](#).

In accordance with **Schedule 2 of the AIFC General Rules**, the following services are classified as Ancillary Services and may be offered within the AIFC upon obtaining the appropriate licence:

- Providing Legal Services.
- Providing Audit Services.
- Providing Accountancy Services.
- Providing Consulting Services.

Entities intending to provide any of these services must ensure compliance with the applicable regulatory requirements under the AIFC framework.

2. Legal and Regulatory Framework

ASPs must operate in compliance with the following key regulatory documents:

- [AIFC Financial Services Framework Regulations](#) – overarching framework that governs all activities conducted within the AIFC under the required authorisation and supervision ensuring that entities operate in compliance with the applicable regulatory.
- [AIFC General Rules](#) – general requirements for authorisation of firms applying for Ancillary Services, including key individuals, systems and control, corporate governance, and [Schedule 2: of Ancillary services](#);
- [AIFC Conduct of Business Rules](#) – ongoing requirements from conduct perspective.
- [AIFC Anti-Money Laundering Rules](#) – Anti-money laundering (“AML”), countering the financing of terrorism (“CFT”), requirements for the Designated Non-Financial Businesses and Professions (“DNFBPs”) and Registered Auditors.
- [AIFC Fees Rules](#) – fees and fines to be paid to the AFSA.
- [AIFC Auditor Rules](#) – reference point for all persons who are permitted to carry out audit services in the AIFC;
- [AIFC Rules on Currency Regulation and Provision of Information on Currency Transactions in the AIFC](#) – terms and procedures for conducting currency transactions within the AIFC. They apply to AIFC Participants, AIFC Banks, and related parties involved in financial, professional, and other currency operations within the Centre.

- [AIFC Rules on the Substantial Presence of the AIFC Participants Applying Tax Exemptions for the payment of CIT, VAT.](#)

Each ASP is expected to familiarize itself with these regulations and ensure internal policies reflect the requirements outlined.

3. Authorisation and Registration Requirements for Conducting Activities in the AIFC

To conduct activities within the AIFC as an ASP, a Person (“an applicant”, “the Firm”) must complete the following processes:

3.1 Submission of Application for a Licence

Applicants must submit a completed application for a Licence form along with the required supporting documents to AFSA.

Once the application for a Licence is submitted, AFSA assigns a Case Officer, who is responsible for reviewing the submission and assessing compliance with regulatory requirements.

3.1.1. Online application for a Licence via Digital Resident Portal

Applicants are strongly encouraged to use the Digital Resident Portal (DRP) for an efficient and transparent registration process. The online system provides step-by-step guidance and reduces manual handling errors.

To register online:

- Log into the Digital Resident Portal <https://digitalresident.afsa.kz>
- Select the option **"New Application"**
- Choose **"Ancillary service application"**
- Complete the application form and upload the required documents as per the instructions
- Submit the application for review

If any technical difficulties arise during this process, please contact: customercare@afsa.kz

3.1.2. Offline application for a Licence (Paper-Based)

In limited cases where online registration is not feasible, applicants may proceed with offline registration. This route is typically available under exceptional circumstances, such as:

- Technical access limitations
- Legal constraints preventing electronic submission
- Applications for Modification

To proceed with offline application for a Licence or Modification:

Submit a formal request to the Registrar of Companies via asp@afsa.kz explaining the rationale for offline submission

- Upon approval, complete the paper-based version of the application form provided by AFSA. Visit the AIFC website under the "Authorisation" section to access the forms. ([AFSA – Astana Financial Services Authority » Ancillary Services Provider \(ASP\)](#))
- Submit all required documents via mail asp@afsa.kz including payment confirmation.

Note: All offline submissions are subject to additional verification and may require a longer processing

timeline.

3.2 Initial Review and Feedback

The Case Officer conducts an initial assessment to ensure that all required information is provided and that the applicant meets the regulatory criteria.

If deficiencies or missing information are identified, the applicant will receive a request for additional details, which must be addressed in a timely manner to avoid delays in processing.

3.3 In-Principle Approval

If the application meets the necessary criteria, AFSA issues an In-Principle Approval (IPA), setting out specific conditions that must be fulfilled before the Licence can be granted. These typically include:

- Incorporation of a legal entity within the AIFC (if not already registered);
- Fulfillment of all stipulated conditions, including regulatory, operational, and governance requirements.

At this stage, the entity is not yet authorised to provide Ancillary Services.

3.4 Fulfilling IPA Conditions

The applicant must satisfy all conditions outlined in the IPA before proceeding to the final stage. This includes:

- Completing the legal incorporation process (if applicable);
- Providing documented confirmation of compliance with IPA conditions, including any outstanding regulatory confirmations required by AFSA.

3.5 Registration process

Following the receipt of IPA, the company must complete the registration process, which includes:

- Submission of the registration application along with all required supporting documentation;
- Obtaining a **Business Identification Number (BIN)**;
- Fulfillment of all stipulated conditions.

This is the formal process of incorporating a legal entity within the AIFC framework, ensuring adherence to the applicable corporate governance standards and operational requirements.

For more detailed information, please refer to the [Guidance on the Registration Process in the AIFC](#)

3.6 Issuance of Licence

Once registration is successfully completed, the BIN is issued, conditions in IPA are fulfilled, the Firm will be eligible to obtain a licence from the Astana Financial Services Authority (AFSA). The official licence will authorize the Firm to commence operations for the provision of Ancillary Services, as defined under [AIFC General Rules Schedule 2](#), for the purposes of offering the following services:

- [Providing Legal Services](#);
- [Providing Audit Services](#);
- [Providing Accountancy Services](#);
- [Providing Consulting Services](#).

Each service type is subject to specific regulatory obligations and standards outlined by the AIFC.

Important Notes:

- The licence will be granted upon verification that all conditions have been satisfied;
- The In-Principle Approval is valid for a specified period. The company must complete the registration and fulfill conditions in the In-Principle Approval within this timeframe;
- Failure to fulfill the required conditions may result in delays or rejection of the licence application.

4. General Provisions for All Applicants

A Person may apply to the AFSA for a Licence permitting a Centre Participant to carry on one or more Ancillary Services by choosing one of the following methods:

- Apply for a licence to establish a new legal entity or obtain a licence for existing firm within the AIFC;
- Apply for a licence to establish a branch of a company incorporated outside the AIFC.

The application form requires detailed information about the applicant's entity, including its registration details, business model, intended services, and governance structure.

A Person may submit a complete application to AFSA through the [AIFC | Digital Residency \(digitalresident.kz\)](#). The key sections of the application form include the following:

4.1 Registered Office Requirements for Ancillary Service Providers (ASPs)

All Ancillary Service Provider (ASP) companies seeking registration within the AIFC must establish and maintain a registered office within the AIFC territory in Astana, Kazakhstan.

The registered office must meet the following conditions:

- **Physical Office Requirement:**

The registered office must be a physical office space located within the designated AIFC territory. Virtual offices or P.O. boxes are not acceptable for the purposes of authorisation.

- **Documentary Evidence:**

Applicants are required to submit evidence of the registered office as part of the authorisation application. Acceptable forms of evidence include, but are not limited to:

- A lease agreement indicating the physical address of the office within the AIFC;
- A title deed or equivalent document demonstrating legal ownership or right of use of the office space.

- **Definition of AIFC Territory:**

The AIFC territory is defined by the Decree of the President of the Republic of Kazakhstan dated 31 December 2015, No. 161.

Applicants are advised to refer to the [AIFC Territory Map](#) to ensure that the proposed registered office is located within the designated area.

Failure to comply with these requirements may result in delays or rejection of the authorisation application. Therefore, it is imperative to ensure that the registered office meets the AIFC's physical and territorial requirements before submission.

4.2 Human Resources

This section outlines the organizational structure and the qualifications of key personnel, including:

- The qualifications and experience of management, including the Chief Executive Officer (CEO), Money Laundering Reporting Officer (MLRO), and other key staff members who aims to provide services;
- To outline the scope of services to be covered by each individual, including a brief description of their responsibilities and functional role within the organization, with a focus on the services to be provided;
- Employment status (e.g., full-time or part-time, in-house or outsourced).

It is important to note that all staff, including the MLRO, must be included in the HR section of the application at E-Residence Portal, [AIFC | Digital Residency](#)

4.3 Shareholder Structure

Applicants must submit a detailed chart showing the ownership structure of the entity. This chart must:

- Illustrate the entity's ownership from the corporate level down to the **individual(s) who ultimately own or control the company** (Ultimate Beneficial Owners or UBOs).
- Include the names, nationalities, and ownership percentages of all shareholders.
- Clearly identify any holding companies or intermediary entities in the ownership chain.

4.4 Non-regulatory Business Plan

Applicants must provide a comprehensive overview of their business operations, including:

- Description of the core business activities and the ancillary services to be provided;
- Identification of target markets and client segments;
- An explanation of how the entity's business model aligns with the services intended to be offered within the AIFC;
- Business Plan outlining the firm's strategic objectives and financial projections;
- Risk Management Framework demonstrating the firm's approach to identifying, assessing, and mitigating operational, financial, and regulatory risks;
- Policies and Procedures detailing how the firm will adhere to AIFC regulations, including Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) obligations and Code of Business Conduct;
- Fit and Proper Documentation submitting background checks, qualifications, and professional references for key individuals, including the Chief Executive Officer (CEO), Ultimate Beneficial Owner (UBO), and Money Laundering Reporting Officer (MLRO).

4.5 AML CTF And Sanctions

This section is applicable for the firms applying for **Providing Legal Services, Providing Audit Services, Providing Accountancy Services and Company Service Providers**.

MLRO is an [Approved Individual](#) who is approved by the [AFSA](#) to carry out a [Controlled Function](#).

Requirements for appointment of MLRO:

- The MLRO must be resident in the Republic of Kazakhstan except in the case of the MLRO for a Registered Auditor;
- The MLRO must provide evidence of obtaining Anti-money laundering (AML)/ Countering the financing of terrorism (CFT) certification and relevant experience;
- The MLRO must register online with the Financial Intelligence Unit of the Republic of Kazakhstan ("FIU") for Threshold transactions reports ("TTRs") / Suspicious Transaction Reports ("STRs");
- The MLRO must have at least two years of work experience in the field of AML/CFT;
- in the absence of the specified experience in the field of AML/CFT experience in adjacent fields can be accepted (for example, legal, risk management, audit, currency controls, compliance controls, etc.) in the presence of a certificate (check and balance) of training for AML/CFT purposes. Such courses or trainings should not be only theoretical and need to offer practical workshop or masterclasses for MLRO in obliged entities taught by experienced professionals (from FIU or certified by ACAMS/ICA/ACFCS or similar organisations). The course/training should include final test, the results of which should be demonstrated;
- The MLRO must have comprehensive knowledge of AML/CFT legislation and [AML rules](#), Guidance applicable to the [Rules of Internal Control](#) including sanctions compliance, PEP identification, and related matters.

Education: A relevant higher degree in finance or law.

Certifications:

- Preferably holds relevant, internationally recognized qualifications in Anti-Money Laundering (AML) and Financial Crime Compliance, such as CAMS, ICA, or equivalent industry-recognized certifications.
- The AML/CFT Legislation Knowledge State Exam for AIFC Participants, in accordance with FIU Order No. 6 on requirements for reporting entities, is conducted at JSC "National Center for Public Service Personnel Management". Alternatively, applicants may choose any other qualified test provider in the market.

Addresses of the Regional Testing Centers are available on the afsa.aifc.kz

Fit and Proper

In accordance with the General Rules Section 1.3.3. "Fitness and propriety" when assessing whether an applicant is fit and proper for the purposes of section 41 of the Financial Services Framework Regulations, the AFSA will consider:

- (a) the applicant's standing with any relevant regulatory body;
 - (aa) registration with the AIFC Legal Services Board of at least one employee of the applicant applying for a Licence to carry on an Ancillary Service of Providing Legal Services;
- (b) the applicant's disciplinary record;
- (c) the applicant's procedures for monitoring and preventing [Financial Crime](#);
- (d) the risk posed to the AIFC by the applicant's activities; and
- (e) such other matters as the AFSA considers relevant.

Additionally will be checked:

- No history of regulatory violations.
- Certificate of no criminal record for MLRO.
- Certificate of absence of registration in a psychiatric and narcological dispensary for MLRO (egov.kz).
- Results of checking the existence of a ban on travel abroad according to the register of debtors for MLRO, and the register of debtors in enforcement proceedings (<https://aisoip.adilet.gov.kz/debtors?ysclid=17ilps6kwu392713632>);

- Demonstration of competence and suitability for the role.
- Effective communication with regulatory bodies and to register online with the FIU for TTR/STR reporting before the commencement of operations.

Independence and Authority

- Independence to act without undue influence or conflict of interest.
 - Sufficient seniority and authority within the organization to enforce compliance effectively. *
- * Independence and authority can be demonstrated through a clear reporting line to senior management, absence of conflicting operational duties, a defined compliance role, and policies affirming decision-making autonomy. (Organisational. Chart, Job description, Internal policy) Also applicant needs to fill out the Application for approved individual, in some cases can provide Undertaking Letter.*

Continuous Professional Development

- Regular attendance at training sessions and industry seminars to stay updated on changing regulations and best practices.

The **AML Policy and Procedure** must be submitted during the application process and developed in accordance with AIFC Rules & Regulations.

The AIFC has detailed guidelines and rules for Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), and sanctions compliance. Here are some key points:

1. **Risk Assessment:** Relevant Persons must identify and assess the risks of money laundering and terrorist financing to which their business is exposed. They must establish and maintain policies and procedures to mitigate and manage these risks.
2. **Customer Due Diligence (CDD):** Firms must identify and verify the identities of their customers and beneficial owners. They must understand the purpose and intended nature of the customer relationship and collect sufficient information to obtain a complete picture of the customer's risk profile.
3. **Suspicious Transaction Reporting (STR):** Firms are required to report suspicious activities to the Financial Intelligence Unit (FIU) through a **Suspicious Transaction Report (STR)**.
The Money Laundering Reporting Officer (MLRO) is responsible for overseeing this process.
4. **Sanctions Compliance:** Firms must have effective, up-to-date screening systems to check customers and transactions against relevant sanctions lists, including those from the United Nations Security Council and any other applicable lists.
5. **Training and Awareness:** Staff must be trained in AML/CTF policies and procedures. This includes understanding the risks, how to identify suspicious activities, and the process for reporting them.
6. **Record-Keeping:** Firms must keep records of any documents and information obtained to meet CDD requirements and maintain transaction records for a specified period.

For more detailed information, you can refer to the AIFC guidelines and following links:

[Anti-Money Laundering and Counter-Terrorist Financing and Sanctions Rules](#)

[Guidelines for Anti-Money Laundering/Countering Terrorist Financing Policies and Procedures](#)

[Guidance \(Requirements\) applicable to the Rules of Internal Control for the purposes of counteracting the legalisation \(laundering\) of proceeds from crime and the financing of terrorism for financial monitoring entities of the Astana International Financial Centre \(the Relevant Persons\)](#)

[Guidance \(Requirements\) for the purposes of counteracting the legalisation \(laundering\) of proceeds from crime and the financing of terrorism, applicable to the Customer Due Diligence in cases when the Astana International](#)

Financial Centre Participants (the Relevant Persons) establish non-face to face business relations with customers

5. Ancillary Services

The AIFC recognizes a range of ancillary services, each requiring a specific set of documents for the relevant licence application. It is strongly recommended to clearly determine the intended services in advance, as this will directly impact the content of the application and accompany documentation in accordance with regulatory requirements. The AIFC defines various ancillary services, each requiring a specific set of documents to obtain the appropriate licence, as outlined below:

5.1 Providing Legal Services

Scope: Providing Legal Services means the application of legal principles or judgement, including but not limited to:

- (a) giving legal advice or counsel; or
- (b) drafting or completion or submission of legal documents or agreements based on the duly issued power of attorney; or
- (c) representation in court proceedings or in an administrative adjudicative procedure in which legal pleadings are filed or a record is established as the basis for judicial review; representation is conducted based on the duly issued power of attorney; or
- (d) negotiation of legal rights or responsibilities; but excluding acting as a lay representative authorised by an administrative agency or tribunal, serving as a judge, mediator, arbitrator, conciliator or facilitator; and participation in employment negotiations, arbitrations or conciliations.

Required Documents:

1. Application Form and Non-Regulatory Business Plan.
2. Valid AIFC Legal Services Board registration certificate for at least one employee. For more detailed information, you can refer to the AIFC website: [How to register as a Legal Adviser.](#)

[How to register as a Legal Adviser](#)

Office of the LSB: officeLSB@aifc.kz

Tel: +7 7172 64 73 94;

3. Resumes/CVs and Professional Qualifications of key personnel.
4. Financial projections.
5. Copy of Anti-Money Laundering - Counter-Terrorist Financing and Sanctions policies - procedures - systems and controls aligned with AIFC AML Rules.
6. Application for Approved Individual (MLRO).
7. Copy of Code of Business Conduct aligned with AIFC legal ethics.
8. Evidence of payment for application fee.

5.2 Providing Audit Services

Scope: Providing Audit Services means:

- (a) performing audit, examination, verification, investigation, certification, presentation or review of financial transactions and accounting records; and
- (b) preparing or certifying reports on audits or examinations of books or records of accounts, balance sheets, and other financial, accounting and related documents.

Required Documents:

1. Application Form and Non-Regulatory Business Plan.

Proof of IFAC qualification, and requisite experience (at least 5 years of relevant audit experience in the last 7 years, including 1 year in a managerial role)” For more detailed information, you can refer to the AFSA website: [AIFC Auditor Rules](#). Professional indemnity insurance as required under [AUD 8.1.1](#);

2. Resumes/CVs and Professional Certifications of auditors/accountants (e.g., ACCA, CPA etc.).
3. Copy of Anti-Money Laundering - Counter-Terrorist Financing and Sanctions policies - procedures - systems and controls aligned with AIFC AML Rules.
4. Copy of Code of Business Conduct aligned with AIFC legal ethics.
5. Code of Ethics for Professional Accountants.
6. Financial Statements or evidence of financial stability.
7. Chain of delivery of the service to customers in a flow chart diagram.
8. Internal Control Procedures to ensure audit quality and to ensure due compliance with the:
 - (i) International Standards on Auditing.
 - (ii) International Standards on Quality Control.
9. Evidence of payment for application fee.

5.3 Providing Accountancy Services

Scope: Providing Accountancy Services means the application of accounting principles or judgement, including but not limited to advising on matters relating to accounting procedure and the recording, presentation or certification of financial information or data, including financial information or data required by any law for the time being in force in the [AIFC](#).

Required Documents:

1. Application Form and Non Regulatory Business Plan
2. Resumes/CVs, Professional Certifications of auditors/accountants (e.g., ACCA, CPA).
3. Copy of Anti-Money Laundering - Counter-Terrorist Financing and Sanctions policies - procedures - systems and controls aligned with AIFC AML Rules.
4. Copy of Code of Business Conduct aligned with AIFC legal ethics.

5. Code of Ethics for Professional Accountants
6. Financial Statements or evidence of financial stability.
7. Chain of delivery of the service to customers in a flow chart diagram
8. Evidence of payment for application fee.

If a firm intends to provide both Audit and Accountancy services, it is imperative to ensure that no conflict of interest exists between these activities. Appropriate measures should be implemented to maintain professional objectivity and independence, in compliance with the AIFC Auditor Rules.

5.4 Providing Consulting Services

Scope: Performing Consultancy Services means providing expert knowledge or advice on a particular topic. Consultancy Services may include the activity of Company service providers.

For more detailed information, you can refer to the following links:

[Guidance on Providing Consultancy Services in the AIFC](#)

The list of Consultancy Services Providing which requires authorisation from the AFSA

1. Compliance, regulatory, due diligence and risk consultancy (including Shari'ah compliance consultancy)
2. Management and business consultancy (including market research) related to Financial Services
3. Tax consultancy
4. *Company Service Provider

* A Company service provider is a Person, not captured by (a) to (e) of the definition of Designated Non-Financial Business and Profession. DNFBP that, by way of business, provides any of the following services to a customer:

- (a) acting as an agent of legal persons to form a company.
- (b) acting as, or arranging for another Person to act as, a director or secretary of a company, a partner of a partnership, or a similar position in relation to other legal persons;
- (c) providing a registered office, business address, or accommodation, correspondence or administrative address for a company, a partnership, or any other legal person or arrangement; or
- (d) acting as, or arranging for another Person to act as, a nominee shareholder for another Person, including through acting on trust for discretionary purposes.

Required Documents:

1. Application Form and Non-Regulatory Business Plan.
2. Resumes/CVs and Professional Qualifications of key personnel.
3. Copy of Anti-Money Laundering - Counter-Terrorist Financing and Sanctions policies - procedures - systems and controls aligned with AIFC AML Rules (if applicable).
4. Copy of Code of Business Conduct aligned with AIFC legal ethics.
5. Financial plans (Projected income and expenses for 3 years).
6. Chain of delivery of the service to customers in a flow chart diagram.

7. Evidence of payment for application fee.

Important Note

All information provided must be accurate and complete. Any discrepancies or omissions may delay the processing of the application or result in its rejection. Ensure that all sections are thoroughly completed and that supporting documents are properly labeled and referenced.

By adhering to this guidance, applicants can submit a complete and compliant application to the AFSA, demonstrating transparency, sound governance, and regulatory readiness.

6. Supervision of Ancillary Service Providers

Ancillary Service Providers (ASPs) operating within the AIFC are subject to ongoing regulatory supervision by AFSA to ensure compliance with applicable rules and regulations. Firms are required to notify AFSA of any material changes affecting their licensing status, governance structure, or key personnel. Certain changes require prior approval to ensure continued regulatory compliance and operational integrity. The overall supervisory approach of the Registrar of Companies with respect to Ancillary Service Providers (ASPs) in the AIFC is risk-based, proportionate, and outcomes-focused.

It includes:

- Ongoing oversight to ensure ASPs maintain compliance with applicable rules and conditions of registration.
- Monitoring of changes to key individuals, ownership, and business activities through required notifications and approvals.
- Review of periodic filings and reports, such as annual returns and financial statements.
- Engagement with firms where concerns arise, including requests for information or corrective action.
- Enforcement actions, where necessary, to address non-compliance.

The Registrar focuses on maintaining high standards of integrity, transparency, and operational soundness within the AIFC framework.

6.1 Modification of Licence

An ASP may apply to modify its existing licence to either expand or reduce the scope of permitted ancillary services. Modifications are subject to regulatory approval and require the submission of an application to AFSA.

Application Requirements:

The firm must submit an application to the Modify Ancillary Services Licence, which should include:

- A detailed rationale for the modification includes how it aligns with the firm's business model and regulatory requirements.
- Supporting documentation demonstrates the firm's capability to provide the proposed services and comply with applicable regulations.
- Confirmation that the firm has the necessary governance, internal controls, and compliance framework in place for the modified activities.

AFSA will assess the request based on the firm's regulatory track record, financial soundness, and risk exposure. Additional information may be requested as part of the review process. Any approved modification will result in the issuance of an updated Licence reflecting the revised scope of services.

A Person may submit a complete application for Modification Licence to AFSA through the AIFC | [Digital Residency \(digitalresident.kz\)](https://digitalresident.kz).

6.2 Voluntary Licence Withdrawal

An ASP may request a voluntary withdrawal of its licence if it no longer intends to provide ancillary services in the AIFC. Before applying, the firm must ensure that all regulatory obligations have been met.

Application Requirements:

- The firm must apply for Licence Withdrawal, along with:
- A Board or Shareholder Resolution approving the withdrawal.
- Declaration
- Confirmation that all regulatory filings and reporting obligations (e.g., annual activity report, AML reporting) have been completed.
- Evidence is that there are no outstanding client obligations or contractual commitments.
- Confirmation that all outstanding supervision fees and regulatory dues have been settled.

AFSA will review the application and may impose specific conditions to ensure an orderly withdrawal process and regulatory compliance.

A Person may submit a complete application for Modification Licence to AFSA through the AIFC | [Digital Residency \(digitalresident.kz\)](https://digitalresident.kz).

6.3 Change of Approved Individual (MLRO)

If an ASP appoints a new Money Laundering Reporting Officer (MLRO), it must obtain AFSA's approval before the appointment takes effect. The MLRO is a controlled function under AIFC AML regulations, and the individual must meet AFSA's fit and proper criteria.

Application Requirements:

The firm must apply for Approved Individual Status, providing:

- The candidate's Curriculum Vitae (CV) detailing relevant AML/CFT experience.
- A copy of the candidate's passport.
- Relevant professional certifications in financial crime compliance, risk management, or regulatory compliance.
- A declaration confirming the absence of any prior regulatory disqualifications or enforcement actions.

AFSA may conduct additional due diligence or an interview before granting approval to ensure the candidate's suitability for the role.

A Person may submit a complete application to asp@afsa.kz

6.4 Change of Audit Principal

If an ASP appoints a new Audit Principal, it must notify AFSA and provide confirmation that the candidate meets professional and regulatory standards required under AIFC Auditor Rules.

Application Requirements:

The firm must apply for Audit Principal Status, along with:

- A Board or Shareholder Resolution approving the appointment.
- The candidate's Curriculum Vitae (CV) detailing professional experience.
- Copies of relevant diplomas and certifications.
- Proof of International Federation of Accountants (IFAC) membership (if applicable);
- A valid Professional Auditor Certificate.
- Confirmation of Professional Indemnity Insurance coverage.

AFSA will assess the candidate's qualifications, experience, and regulatory history before granting approval.

A Person may submit a complete application to asp@afsa.kz

6.5 Ongoing Compliance and Reporting Obligations

All ASPs must comply with continuous regulatory supervision by AFSA, which includes:

- Annual Information Return form for Audit Firms, within 1 month of the end of the year.
- AML/CFT compliance, including submission of the Annual AML Return within 2 months of the end of the year, where applicable.
- Annual Activity Return for ALL in accordance with AIFC requirements within 3 months of the end of the year.
- Supervision fee payments are within prescribed deadlines.
- Timely notification of any material changes affecting the firm's operations, ownership structure, or governance.

Failure to comply with these obligations may result in regulatory enforcement actions, including financial penalties, additional supervisory measures, or suspension of the ASP Licence.

A Person may submit a complete application to asp@afsa.kz

7. Application fees for Ancillary Services

7.1 Fees for applications to carry on Ancillary Services

An applicant seeking to carry on one or more Ancillary Services must pay to the AFSA the application fee in accordance with [AIFC Fees Rules](#) for each type of Ancillary Services set out in table 3.1 below.

Activity	Fee (USD)
Providing Legal Services	2 800
Providing Audit Services	2 800
Providing Accountancy Services	2 800
Providing Consulting Services	2 800

7.2 Fees for modification or withdrawal of a Licence

Application to Modify or Withdraw a Licence

An Ancillary Service Provider applying to the AFSA to change the scope of its Licence, to have a condition or restriction varied or withdrawn, or to have its Licence withdrawn must pay the prescribed fee set out in the table 3.2 below.

Application to Modify or Withdraw a Licence	Fee (USD)
Modification of an Ancillary Service Provider's Licence	<p>(a) An Ancillary Service Provider applying to the AFSA to change the scope of its Licence and seeking to carry on one or more new Ancillary Services must pay an application fee equal to 100% of the application fee for each new Ancillary Service, specified in table 3.1 of Schedule 3 of FEES.</p> <p>(b) An Ancillary Service Provider licensed to carry on an Ancillary Service of Providing Consulting Services and applying to the AFSA to change the scope of its Licence in respect of that activity, must pay an application fee equal to 50% of the application fee, specified in table 3.1 of Schedule 3 of FEES</p>
Withdrawal of an Ancillary Service Provider's Licence	At present, the AFSA does not intend to charge an application fee for these activities. Any such application fee shall be determined by the AFSA at a later date.

7.3 Application to Modify or Withdraw a Licence

An Ancillary Service Provider applying to the AFSA to change the scope of its Licence, to have a condition or restriction varied or withdrawn, or to have its Licence withdrawn must pay the prescribed fee set out in the table at 3.2 above.

7.4 Application fee for change of Money Laundering Reporting Officer (MLRO)

An Ancillary Service Provider applying to the AFSA to change Money Laundering Reporting Officer (MLRO) must pay an application fee in the amount of 500 USD.

7.5 Application fee for change or new additional appointment of Audit Principal

An Ancillary Service Provider applying to the AFSA to change or make a new additional appointment of an Audit Principal must pay an application fee in the amount of 500 USD.

8 Supervision fees for Ancillary Services

Ancillary Service Provider must pay to the AFSA the annual supervision fee specified in Schedule 6 of [AIFC Rules](#).

The initial annual supervision fee must be paid in full to the AFSA within 21 days of the date of the commencement of operations.

For more detailed information, you can refer to the [AIFC Fees Rules](#)

The annual supervision fees for Ancillary Services are listed in the table below and are determined by the

activities conducted by the Ancillary Service Provider, as set out below.

Ancillary Services	Fee (USD)
Providing Legal Services	2 500
Providing Audit Services	3 000
Providing Accountancy Services	2 500
Providing Consulting Services	1 500 excluding Company service provider activity 3 000 including Company service provider activity

Disclaimer

This guidance document is intended for informational purposes only and does not constitute legal advice. Applicants are encouraged to seek professional legal counsel to ensure full compliance with AIFC rules and regulations.

Contact us



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Monday to Friday from 15:00 to 17:00



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<https://afsa.aifc.kz/en>



afsa.kz

ANNEX 1

This section outlines the key steps and documentation required to complete and submit your application successfully to the AFSA through the [AIFC | Digital Residency \(digitalresident.kz\)](https://digitalresident.kz)

Section 1: Notes for Completing this Form

- Read all the instructions carefully before proceeding.
- Ensure all information provided is accurate and up to date.
- Prepare any supporting documents required for each section in advance.

Section 2: Declaration by the Applicant

- Review the declaration thoroughly.
- Sign and date the declaration to confirm the accuracy of the information provided.
- Ensure the declaration is signed by an authorized representative of the company.

Section 3: Applicant Contact Details

- Provide the full legal name of the applicant.
- Include the registered address, email, and telephone contact details.
- Designate a primary point of contact for any queries regarding the application.

Section 4: Information About the Applicant

- Provide the company's registration details, including incorporation date and registration number.
- State the nature of the business and the jurisdiction of operation.
- Include a description of the company's business activities.

Section 5: Information on Shareholders

- List all shareholders holding shares in the company.
- Provide the full name, nationality, and percentage of shares held by each shareholder.
- Include supporting documentation.

Section 6: Ancillary Services

- Outline any ancillary services the applicant intends to provide.
- Specify whether the services are core or non-core to the applicant's main business activities.

Section 7: Human Resources

- Include the total number of employees and a summary of their qualifications.
- Detail any relevant training programs and policies in place.

Section 8: AML, CTF, and Sanctions

- Describe the company's Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) policies.
- Provide evidence of internal controls, risk assessment procedures, and compliance programs.
- Attach a copy of the latest AML/CTF compliance report, if applicable.

Section 9: Conduct of Business

- Detail the applicant's business conduct policies and ethical standards.
- Outline procedures for handling client complaints and resolving disputes.
- Attach copies of internal conduct guidelines.

Section 10: Auditor Requirements

- Provide the name and contact details of the appointed auditor.

Section 11: Ancillary Services Audit Principal

- Identify the designated audit principal for ancillary services.

- Attach their CV and proof of qualifications.

Section 12: Non-Regulatory Business Plan

- Submit a comprehensive business plan covering the next three years, including the following:
- Executive summary of the applicant firm
- General business description of activities
- Market definition
- Risk management
- Financial Plans

Section 13: Additional Supporting Documents

- Attach any additional documents required to support the application.
- Label all attachments clearly and cross-reference them to relevant sections.

Section 14: Fit and Proper Questionnaire

- Complete the Fit and Proper Questionnaire for each key individual and shareholder.
- Provide supporting documentation, such as background checks and references.

Section 15: Submitting Your Application to the AFSA

- Review the entire application form to ensure all sections are completed accurately.
- Compile all required supporting documents.
- Submit the completed application and attachments electronically to the AFSA.
- Retain a copy of the submitted application for your records.